

Comments of Polaris Wireless, Inc.

Polaris Wireless, Inc. ("Polaris") is a Silicon Valley based start-up company that has developed a technology for locating cellular phones. Polaris hereby seeks to correct the record of its field test results described in the Cingular Wireless LLC ("Cingular") Petition for Limited Waiver of Section 20.18(f) ("Petition"), in CC Docket No. 94-102, DA 98-2631, dated August 30, 2001.

On page 9 of its Petition, Cingular included the following information about Polaris's testing:

"These tests produced 237 meter accuracy for 67 percent of calls and 397 meter accuracy for 95 percent of calls in urban environments. In suburban environments, the tests demonstrated 209 meter accuracy for 67 percent of calls and 323 meter accuracy for 95 percent of calls."

This information should be corrected as follows:

"These tests produced 121 meter accuracy for 67 percent of calls and 357 meter accuracy for 95 percent of calls in urban environments. In suburban environments, the tests demonstrated 237 meter accuracy for 67 percent of calls and 397 meter accuracy for 95 percent of calls."

These test results were provided to Cingular by Polaris and were inadvertently misstated. Polaris has discussed this error with Cingular, and they have concurred that the location accuracy statistics from these two sets of field tests were inaccurately copied from the Polaris Wireless report into the Petition.

Polaris believes that correcting the record here is important given the likelihood that, with further development and field testing, its RF Signatures™ technology will satisfy the Commission's Phase II enhanced 911 requirements at lower cost and with faster deployment than any of the competing solutions described in Cingular's Petition.

Respectfully Submitted,

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